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February 4, 2015

**VIA ECF**

Honorable Michael A. Shipp, U.S.D.J.  
United States District Court for the  
District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street, Room 7W  
Trenton, New Jersey 08608

**Re: *In re New Jersey Tax Sale Certificates Antitrust Litig.*,  
Master Docket No. 3:12-CV-01893-MAS-TJB**

Dear Judge Shipp:

Together with our co-counsel, this office represents plaintiffs and the class in this matter. We are pleased to report that, as of January 29, 2015, plaintiffs reached settlements in principle with all remaining defendants. As a result, we write to request that the Court briefly stay the dates for class notice contained in the Order Granting Preliminary Approval of Class Settlement With Defendants Norman T. Remick, American Tax Funding, LLC, Robert W. Stein, and Lambros Xethalis, and Authorizing Dissemination of Notice to the Class (Docket Entry No. 394), entered on January 29, 2015.

Plaintiffs' October 15, 2014 status report to Magistrate Judge Bongiovanni (Docket Entry No. 373) described which defendants had settled with plaintiffs as of that date and the state of preliminary approval of the settlements with those defendants. That status report noted that all defendants who had not then settled had filed motions to dismiss the Amended Consolidated Master Class Action Complaint or, in the case of defendant Michael Mastellone, a motion to stay this matter. The Court ruled on those motions on October 31, 2014, denying defendant Mastellone's motion to stay, and denying in part and granting in part the motions to dismiss filed by all other defendants who had not settled, thereby allowing the case to proceed (Docket Entry Nos. 374, 375).

Thereafter, as stated most recently in plaintiffs' January 16, 2015 status report to Magistrate Judge Bongiovanni (Docket Entry No. 392), plaintiffs entered into settlements with all remaining defendants except for defendant Mastellone. Judge Bongiovanni referred plaintiffs and defendant Mastellone to mediation (Docket Entry No. 391), and Bruce I. Goldstein, Esq.,



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was appointed as mediator. On January 29, 2015, with the invaluable assistance of Mr. Goldstein, plaintiffs and defendant Mastellone reached a settlement. Plaintiffs and the recently-settling defendants are in various stages of preparing settlement agreements, and plaintiffs believe that settlement agreements with all of those defendants should be signed within a few weeks.

Since plaintiffs have now reached settlements with all defendants, plaintiffs believe that it would be most efficient and cost-effective to issue the notice directed by the Court's January 29, 2015 Order to the entire class at once, covering the settlements with all defendants, rather than to issue notice multiple times. Giving one omnibus notice would also avoid devoting more of the settlement funds than necessary to the costs of notice, thereby ensuring that the Class will receive more of those settlement funds.

Accordingly, plaintiffs respectfully request that the Court stay the dates for class notice and the dates that follow from that notice, which are contained in paragraphs 15-25 of the January 29, 2015 Order, so as to permit plaintiffs to move for preliminary approval of the last group of settlements. As part of that motion, plaintiffs will also seek an Order similar to the January 29, 2015 Order that approves the notice plan and directs issuance of notice to the entire Class, as to all settlements, and sets appropriate new dates for the events described in paragraphs 15-25 of the January 29, 2015 Order. Plaintiffs currently expect to move for preliminary approval of all remaining settlements, and for authorization to send out a revised notice of all settlements, by Friday, April 3.

Thank you very much for your consideration.

Respectfully,

*/s/ Bruce D. Greenberg*

Bruce D. Greenberg

bdg/abm

cc: All Counsel of Record (via ECF)